

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

ROBERT H. WRIGHT, JR.,)	
)	
Plaintiff,)	CIVIL ACTION
)	FILE NO. 4:15-cv-34 (CDL)
v.)	
)	
S/A JERALD WATSON, et al,)	
in their individual capacities,)	
)	
Defendants.)	

CERTIFICATE OF NEED TO FILE DISCOVERY

COMES NOW Plaintiff Robert H. Wright, Jr. and hereby files this Certificate of Need to File Discovery in response to Defendants' Request to File Original Discovery (Document 71-13) and for use in Plaintiff's Response to Defendants' Motion for Summary Judgment. Plaintiff hereby files the following depositions:

1. The deposition of Jennifer Webb dated October 2, 2015;
2. The deposition of Sheriff Mike Jolley dated October 20, 2015;
3. The deposition of Robert Austin dated February 29, 2016;
4. The deposition of Lauren Stinson dated February 29, 2016;
5. The deposition of Johnathan Goodrich dated February 24, 2016;
6. The deposition of Michael Pitts dated February 24, 2016;
7. The deposition of Michael Binion dated Febraury 8, 2016;

8. The deposition of Jeremy Bolen dated December 21, 2015;
9. The deposition of Paul Wofford dated December 21, 2015;
10. The deposition of Mark Bracewell dated December 17, 2015;
11. The deposition of Jerald Watson dated November 11, 2015;
12. The deposition of Sven Armburst dated February 24, 2016;
13. The deposition of Alex Berninobis dated February 29, 2016;
14. The deposition of Roger Carol dated February 24, 2016; and
15. The deposition of Johnathan Memmo dated February 29, 2016.

Respectfully submitted this 12th day of May, 2016.

/s/ Craig T. Jones

CRAIG T. JONES
Georgia Bar No. 399476
Counsel for Plaintiff

THE ORLANDO FIRM, P.C.
Decatur Court, Suite 400
315 West Ponce de Leon Avenue
Decatur, GA 30030
(404) 373-1800
craig@orlandofirm.com

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CERTIFICATE OF SERVICE

I hereby certify that on this the 12th day of May 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following attorneys:

Kenneth Drew Jones, Esq.
Russell A. Britt, Esq.
HALL BOOTH AND SMITH, PC
191 Peachtree St.
Suite 2900
Atlanta, GA 30303
kjones@hbss.net
rbritt@hallboothsmith.com

/s/ Craig T. Jones

Craig T. Jones
Georgia Bar No. 399476
Counsel for Plaintiff

THE ORLANDO FIRM, P.C.

Decatur Court, Suite 400

315 West Ponce de Leon Avenue

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